

IN THE UNITED STATES DISTRICT COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA

MICHAEL J. MITCHELL and	:	
TAMMITHA M. MITCHELL, husband	:	
and wife	:	
	:	
Plaintiffs	:	CIVIL ACTION NO. 02-3652
	:	
v.	:	
	:	
POWERMATIC CORPORATION, a/k/a	:	JURY TRIAL DEMANDED
POWERMATIC, INC., JET	:	
EQUIPMENT & TOOLS, INC., and	:	
DEVLIEG-BULLARD, INC., a/k/a	:	
DEVLIEG BULLARD II, INC.	:	
	:	
Defendants	:	

**PLAINTIFFS' PRETRIAL DISCLOSURES**

**I. WITNESSES**

**A. LIABILITY**

**1. EXPECT TO CALL**

- a. Plaintiff Michael J. Mitchell
- b. Richard A. Colberg  
Robson Lapina  
350 New Holland Avenue  
Lancaster, PA 17602  
(717) 293-9050
- c. Sam Ellis  
WMH Tool Group, Inc.
- d. Ben Nixon  
WMH Tool Group, Inc.
- e. Additional witnesses Plaintiffs would have known about had discovery been completed as order by this Court
- f. Any witness listed by any Defendant

**2. MAY CALL**

Roy Oatman

Chris Seltzer  
Stephen Tuce  
Josh Walton  
Ed Deardorf  
Dean Gochnauer

c/o Brubaker Kitchens, Inc.  
1422 Manheim Pike  
Lancaster, PA 17602

**B. DAMAGES**

**1. EXPECT TO CALL**

- a. Plaintiffs Michael J. and Tammittha M. Mitchell
- b. Edward D. Maley, M.D.  
Orthopedic Associates of Lancaster, Ltd.  
Lancaster, PA 17602
- c. Robert Charles Steinman, MD  
1671 Crooked Oak Drive  
Lancaster, PA 17601
- d. Gary R. Kutay  
L&H Group  
2889 Graystone Road  
East Petersburg, PA 17520
- e. Additional witnesses Plaintiffs would have known about had discovery been completed as order by this Court
- f. Any witness listed by any Defendant

**2. MAY CALL**

Roy Oatman  
Chris Seltzer  
Stephen Tuce  
Josh Walton  
Ed Deardorf  
Dean Gochnauer

c/o Brubaker Kitchens, Inc.  
1422 Manheim Pike  
Lancaster, PA 17602

## II. EXHIBITS

### A. LIABILITY

1. Invoice for Powermatic Shaper Model 27
2. Photographs of Powermatic Shaper Model 27
3. Photographs from Report of Richard A. Colberg
4. Photographs of workplace where injured
5. Photographs of different guards
6. Model of or actual Powermatic Shaper Model 27
7. Various raised panels such as Plaintiff shaped with Powermatic Shaper Model 27
8. Guards to use with Powermatic Shaper Model 27
9. Brubaker brochures and/or pictures showing finished cabinets showing type panel Plaintiff working on
10. Model 27 & 27 PS Shaper Maintenance Instructions and Part List
11. Wood Shaper Model 27 & 27 Super Instruction Manual & Parts List
12. Delaware State Certificate of Incorporation of Powermatic Corporation
13. Delaware State Certificate of Dissolution of Powermatic, Inc.
14. Asset Purchase Agreement between DeVlieg-Bullard, Inc. and Sunhill NIC Company, Inc.
15. September 29, 1999 Bankruptcy Court Order of Judge Marilyn Shea Stonum Authorizing Debtor to Sell Powermatic Assets
16. Asset Purchase Agreement between DeVlieg-Bullard and Jet Equipment & Tools, Inc.
17. Assignment and Assumption Agreement between Powermatic Corporation and Jet Equipment & Tools

18. Technical drawings and designs of Powermatic Shaper Model 27
19. Advertisements and web pages of Powermatic products
20. Expert Report of Richard A. Colberg
21. Additional documents or exhibits from any party which Plaintiffs would have obtained had discovery been completed as order by this Court
22. Any exhibits listed by any Defendant

**B. DAMAGES**

1. Photographs of injuries
2. Medical Records of Michael J. Mitchell
3. Medical Bills of Michael J. Mitchell
4. W2s, Tax Returns and Disability Statements of Michael J. Mitchell
5. Expert Report of Gary R. Kutay
6. Expert Report of Robert Charles Steinman, M.D.
7. Pillep Hand Prosthesis
8. Additional documents or exhibits from any party which Plaintiffs would have obtained had discovery been completed as order by this Court
9. Any exhibits listed by any Defendant

SOREN P. WEST LAW OFFICES

August 14, 2003

BY:

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